

SOLANO COUNTY WATER AGENCY



September 12, 2008

Phil Isenberg, Chairman
Delta Vision Blue Ribbon Task Force
1416 9th Street, Suite 1311
Sacramento, CA 95814

Dear Chairman Isenberg:

The Solano County Water Agency has the following comments on third draft of Delta Vision Blue Ribbon Task Force Strategic Plan.

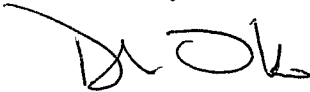
1. The Strategic Plan must support long standing protections of "Areas of Origin" and priority water rights system in California law. Public trust and 'reasonable and beneficial use' concepts must not be used to undermine Area of Origin and water rights priorities. To do otherwise will start a North-South water war that is an unproductive exercise that will doom any cooperative effort to implement the Strategic Plan. (pg 4 last paragraph; pg 15 last paragraph; pg 91)
2. Make protection of Delta communities and Delta public agencies from intended and unintended consequences of Strategic Plans as third co-equal value. Provide for full mitigation for impacts to Delta communities from physical and economic changes resulting from the Strategic Plan. In particular the conversion of agricultural lands to tidal, wetland and open water habitat. (pg 47-48; pg 58)
3. CDEW Council must include Delta local government representatives as members. (pg 14; pg 72)
4. Support recommendations regarding need to relocate intake of the North Bay Aqueduct of the State Water Project. Suggest changing wording to say provide for an "alternate intake" to the North Bay Aqueduct. The existing intake may still be utilized when water quality and fish problems are not a concern. (pg 44-45)

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5. Do not regulate water conservation on per capita basis (except possibly on a statewide basis). Per capita regulation does not accurately portray local water use efficiency because the amount of Commercial, Industrial and Institutional (CII) use compared to residential use in local agencies varies tremendously. A per capita regulation is unfair to local areas with higher CII use. There must be separate goals and measurements of residential, CII and agricultural water use. Maintain California Urban Water Conservation Council principle of BMP exemptions for non-locally cost effectiveness. Increasing price of water over time will automatically increase the amount of conservation without adverse local economic impacts. (pg 29 footnotes; Strategy 1 – pages 31-34; pg 81 #4)
6. SCWA support comments made by Solano County.

Sincerely,

A handwritten signature in black ink, appearing to read 'D. Okita', with a stylized flourish at the end.

David B. Okita
General Manager